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April 21, 2008

VIA FACSIMILE: 212-805-6326

Hon. Colleen McMahon
U.S. District Court, SDNY
500 Pearl St., Room 640
New York, NY 10007

Re: Pere, et al. v. Time Moving and Storage, et al., 08-cv-2775 (CM)

Dear Judge McMahon:

This law firm represents the defendants in this case. I write to request a brief extension of defendants' time to respond to the complaint, extending defendants' response time to May 8, 2008. This extension would not affect any other dates in the case. I have not yet obtained plaintiffs' consent—I attempted today to reach plaintiffs' counsel by telephone and e-mail. This is defendants' first such request.

If service was good, defendants' response time would be today. I write on short notice because I only learned today that plaintiffs purportedly served the Summons and Complaint. My initial inquiry suggests that defendants may not have been served in the manner claimed, and that even if properly served, defendants did not *actually* receive the Summons and Complaint until after a letter from plaintiffs' counsel prompted further inquiry.

Very truly yours,

CLIFTON BUDD & DEMARIA, LLP

By:

Arthur J. Robb

cc: David Stern, Esq. (via fax: 212-563-9870)

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4/22/08